

NIEHS recommends using the non-animal testing methods only to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough.

Animal tests are not only cruel, they are virtually irrelevant to humans, producing inaccurate and misleading results in almost half of all cases. Animal tests have never been proved to be scientifically reliable, reproducible, or relevant to humans, while non-animal test methods are required to undergo rigorous scientific scrutiny ("validation") before they can be used. Unsurprisingly, non-animal cell culture tests have been found to be highly predictive of chemical toxicity in humans.

In light of these facts, government agencies should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose tests.

Thank you for your time.
Sincerely,

Karen Mitchell
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